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Proposed Counsel to the Examiner

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CELSIUS NETWORK LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**NOTICE OF PRESENTMENT OF
MOTION TO APPROVE EXAMINER'S WORK PLAN**

PLEASE TAKE NOTICE that the Examiner will present the attached *Motion to Approve the Examiner's Work Plan* (the “**Motion**”) to the Honorable Martin Glenn, Chief United States Bankruptcy Judge, for approval and signature on **October 21, 2022, at 12:00 p.m.**, prevailing Eastern Time (the “**Presentment Date**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

Any responses or objections to the relief requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York, and the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Dkt. 521]; (c) be filed electronically with the Court on the docket of *In re Celsius Network LLC*, No. 22-10964 (MG) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **October 18, 2022, at 4:00 p.m.**, prevailing Eastern Time (the "**Objection Deadline**"), by (i) the entities on the Master Service List available on the case website of the above-captioned debtors and debtors in possession (the "**Debtors**") at <https://cases.stretto.com/celsius>, and (ii) any person or entity with a particularized interest in the subject matter of the Motion.

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are timely filed and served by the Objection Deadline with respect to the Motion, the Examiner shall, on the Presentment Date, submit the proposed Order Approving the Examiner's Work Plan to the Court, which order the Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Motion and other pleadings

filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: October 11, 2022
New York, New York

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Catherine L. Steege
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CELSIUS NETWORK LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

EXAMINER'S MOTION TO APPROVE WORK PLAN

Shoba Pillay, Examiner in these chapter 11 cases, by her proposed undersigned counsel, files this motion (the “**Motion**”) for entry of an order, substantially in the form attached hereto as **Exhibit B**, approving the Examiner’s proposed Work Plan, attached as **Exhibit A**.

1. On September 14, 2022, the Court entered an order directing the appointment of an Examiner (the “**Examiner Order**”). [Dkt. 820.]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

2. On September 29, 2022, the United States Trustee appointed Shoba Pillay as Examiner and filed a notice of the appointment [Dkt. 920] and the application for the appointment [Dkt. 921]. Also on September 29, 2022, this Court entered an order approving the appointment of the Examiner. [Dkt. 923.]

3. The Examiner Order directs the Examiner, within seven business days after her appointment (that is, by October 11, 2022), to propose a work plan and budget, both of which are subject to the Court's approval on seven days' notice to all parties that have requested notice in these chapter 11 cases under Bankruptcy Rule 2002. (Examiner Order ¶ 7.)

4. In accordance with the Examiner Order, notice of this Motion has been provided to (a) the United States Trustee; (b) counsel to the Debtors; (c) the Official Committee of Unsecured Creditors; and (d) the 2002 Service List maintained by Stretto in these chapter 11 cases.

(Signature page follows.)

WHEREFORE, the Examiner respectfully requests that this Court approve the Examiner's Work Plan, as proposed and attached hereto as Exhibit A.

Dated: October 11, 2022
New York, New York

Respectfully submitted,

JENNER & BLOCK LLP

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